

Hogan Lovells US LLP Columbia Square 555 Thirteenth Street, NW Washington, DC 20004 T +1 202 637 5600 F +1 202 637 5910 www.hoganlovells.com

May 9, 2018

## **VIA ECFS**

Ms. Marlene H. Dortch Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, DC 20554

RE: SES and Intelsat Notice of Ex Parte Presentation

**GN Docket Nos. 17-183, 18-122** 

Dear Ms. Dortch:

On May 7, 2018, representatives of SES and Intelsat met with Media Bureau representatives Michelle Carey, Bureau Chief; Thomas Horan, Chief of Staff; and John Wong and Sean Yun. Participants in the meeting on behalf of SES were Gerald Oberst, President, SES Americom; Kimberly Baum, Vice President, Spectrum Management and Development Americas, SES Americom; and the undersigned, outside counsel to SES; for Intelsat, Susan Crandall, Associate General Counsel, Intelsat; and Henry Gola, Wiley Rein LLP, outside counsel to Intelsat.

In the meeting, the parties discussed their Fixed Satellite Service ("FSS") 3.7-4.2 GHz C-band operations, noting that the bulk of their C-band capacity in the U.S. is used for the distribution of video and audio programming. They added that virtually all television and radio content travels via C-band satellite at some point in its journey, regardless of how the end user ultimately receives it – whether over-the-air or through subscription services such as satellite radio or cable, satellite or over-the-top television. Over 100 million cable, satellite and over-the-air broadcast households receive the majority of their television programming through C-band satellite delivery, as reflected in the record of this proceeding.

In addition, the parties provided a brief overview of their joint, market-based proposal to make spectrum in the 3.7-4.2 GHz band available for mobile broadband use while protecting critical FSS operations. They noted that the 100 MHz clearing target for terrestrial mobile use is what each operator can accomplish reasonably within 18-36 months following a final Commission order, while ensuring the continued availability of highly reliable service to existing video customers.

Finally, the parties expressed their support for the Commission's recent Public Notice<sup>1</sup> in this docket to incentivize registration of earth stations in the 3.7-4.2 GHz band during the current 90-day filing window. SES and Intelsat also described their own outreach efforts to encourage and facilitate earth station registration, including making available "How To" guides for registering receive-only antennas, which are posted on their websites. In addition, they suggested that the Commission

<sup>1</sup> Public Notice, Temporary Freeze on Applications for New or Modified Fixed Satellite Service Earth Stations and Fixed Microwave Stations in the 3.7-4.2 GHz Band, 90-Day Window to File Applications for Earth Stations Currently Operating in 3.7-4.2 GHz Band, GN Docket Nos. 17-183, 18-122, DA 18-398 (Apr. 19, 2018) ("Public Notice").

could undertake further streamlining efforts to maximize registration during the filing window, noting the complexities of the current Form 312 for entities that are not familiar with, or have the technical staff needed for, antenna registration, such as churches receiving religious broadcasting.

This notice is filed pursuant to FCC Rule 1.1206; please contact the undersigned with any questions regarding this matter.

Respectfully submitted,

/s/ Michele C. Farquhar

Michele C. Farquhar Partner

Counsel to SES michele.farquhar@hoganlovells.com
D 202 637 5663

cc: Michelle Carey Thomas Horan John Wong Sean Yun